

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
REBECCA A. PETERSON (CA 241858)
ROBERT K. SHELQUIST
KAREN H. RIEBEL
STEPHEN M. OWEN
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
E-mail: rkshelquist@locklaw.com
rapeterson@locklaw.com
khriebel@locklaw.com
smowen@locklaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JI KWON, Individually and on Behalf of
All Others Similarly Situated,

) Case No. 20-cv-09328-YGR

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Plaintiff,

PLAINTIFF GHEBREHIWET'S

RESPONSE TO JI KWON MOTION

RESPONSE TO JURISDICTIONAL MOTION
FOR CONSOLIDATION OF ACTIONS:

) FOR CONSOLIDATION OF ACTIONS;
)) APPOINTMENT AS LEAD PLAINTIFF:

ROBINHOOD FINANCIAL LLC, and
ROBINHOOD SECURITIES, LLC.

) Hon. Yvonne Gonzalez Rogers

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Defendant.

) Courtroom Room 1, 1301 Clay Street,
) 4th Floor, Oakland, CA

) Date: April 13, 2021

) Time: 2:00 p.m.

PLAINTIFF GHEBREHIWET'S RESPONSE TO JI KWON
MOTION FOR CONSOLIDATION OF ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF; AND APPROVAL OF LEAD COUNSEL
CASE No. 20-cv-09328-YGR

1 Plaintiff Robel Ghebrehiwet (“Plaintiff”) respectfully submits this Memorandum of Points
2 and Authorities in Response to Plaintiff Ji Kwon’s Motion for Consolidation of Actions;
3 Appointment as Lead Plaintiff; and Approval of Lead Counsel (“Motion”). First, although not yet
4 transferred from the Southern District of California, Plaintiff’s action (entitled *Robel Ghebrehiwet,*
5 *et al. v. Robinhood Financial LLC, et al.*, Court File 21-cv-01739 (N.D. Calif.) and Court File 21-
6 cv-00214-AJB-AGS (S.D. Calif.)), the Motion properly noted that following transfer it would be
7 appropriate to consolidate. The Motion also included Plaintiff’s action in the proposed
8 consolidated caption.
9

10 As Plaintiff’s case is now transferred, Plaintiff formally joins in that request of
11 consolidation of his case with the other actions pending before this Court.
12

13 Second, Plaintiff also joins in the Motion’s requested relief of appointing Ji Kwon as lead
14 plaintiff and appointing Ahdoot & Wolfson, PC; Bursor & Fisher, P.A., and Liddle & Dubin P.C.
15 as Lead Counsel.
16

DATED: March 23, 2021

Respectfully submitted,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

18 s/ Rebecca A. Peterson

19 Robert K. Shelquist

20 Karen H. Riebel

Rebecca A. Peterson, CA #241858

21 Stephen M. Owen

100 Washington Avenue South, Suite 2200

22 Minneapolis, MN 55401

Telephone: (612) 339-6900

23 Facsimile: (612) 339-0981

rkshelquist@locklaw.com

24 khriebel@locklaw.com

rapeterson@locklaw.com

25 smowen@locklaw.com

26 **Attorneys for Plaintiff Robel Ghebrehiwet**

27 PLAINTIFF GHEBREHIWET’S RESPONSE TO JI KWON
28 MOTION FOR CONSOLIDATION OF ACTIONS, APPOINTMENT
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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I declare under penalty of perjury that the foregoing is true and correct.

By: s/ Rebecca A. Peterson
REBECCA A. PETERSON

PLAINTIFF GHEBREHIWET'S RESPONSE TO JI KWON
MOTION FOR CONSOLIDATION OF ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF; AND APPROVAL OF LEAD COUNSEL
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